

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AR BUTUS BIOPHARMA CORPORATION)
and GENEVANT SCIENCES GmbH,)
Plaintiffs,) C.A. No. 22-252 (MSG)
v.)
MODERNA, INC. and MODERNATX, INC.)
Defendants.)

**MOTION AND [PROPOSED] ORDER TO SEAL
PORTIONS OF PLAINTIFFS' MOTION TO COMPEL (D.I. 184)**

Pursuant to the Protective Order (D.I. 91) as modified by the Court's November 14, 2023 Order (D.I. 155), Defendants respectfully move this Court for an order granting leave to file partially redacted versions of Plaintiffs' Motion to Compel (D.I. 184) ("Plaintiffs' Motion") and Exhibits 1, 7, and 10-11 thereto (collectively, the "Confidential Materials").

Defendants' motion and supporting papers redact for the parties' confidential information. The Confidential Materials either include, or reference and/or quote, Defendants' sensitive and confidential information. The grounds for the motion are set forth in Defendants' brief in support of this motion, as well as the declaration of Peter Wojciechowski attached thereto. Redacted versions of the exhibits will be filed separately on the docket.

WHEREFORE, Defendants respectfully request that the Court grant this motion and enter the enclosed order permitting Defendants to file redacted versions of the above documents.

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/s/ Travis J. Murray

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January 12, 2024

RULE 7.1.1 CERTIFICATE

I hereby certify that the subject of the foregoing motion has been discussed with counsel for the plaintiffs and that plaintiffs do not oppose this motion.

/s/ Travis J. Murray

Travis J. Murray (#6882)

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Defendants.)

[PROPOSED] ORDER

The Court, having considered Defendants' Motion to Seal (the "Motion"), IT IS HEREBY ORDERED this ____ day of _____, 2023 that the Motion is GRANTED.

Leave is given for Defendants to file Plaintiffs' Motion to Compel (D.I. 184) and 1, 7, and 10-11 thereto in redacted form.

United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on January 12, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on January 12, 2024, upon the following in the manner indicated:

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